

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

KENT H. MIDDLETON, JR., as  
PERSONAL REPRESENTATIVE of the  
ESTATE OF AMANDA MIDDLETON

Plaintiff,

V.

NISSAN MOTOR COMPANY, LTD., NISSAN )  
NORTH AMERICA, INC., AUTOLIV, INC. and )  
AUTOLIV ASP, )

Defendants.

**Case No.: 7:10-cv-02529-MGL**

***PLAINTIFF'S SECOND AMENDED  
RULE 26(a)(2) DISCLOSURES***

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, the Plaintiff amends his previous responses as follows regarding expert witnesses:

1. Kendrick E. Richardson, M.S., P.E.  
Engineering Experts, Inc.  
1000 Johnnie Dodds Blvd., Ste. 103-352  
Mt. Pleasant, SC 29464  
Telephone: (843) 856-4644

Mr. Richardson is an accident reconstructionist. He is expected to testify as to his investigation, inspection, fact-findings, and professional opinions in regard to subject vehicle and subject incident. Mr. Richardson will also testify concerning the vehicle speed, vehicle motions, and path of travel. *A copy of Mr. Richardson's curriculum vitae and written report is attached.*

2. Craig Good, Ph.D., P.Eng.  
Collision Analysis Ltd.  
43 Skyline Crescent NE  
Calgary, Alberta T2K 5X2  
Telephone: (403) 250-7533

Dr. Good is a buckle design and manufacturing engineer. He is expected to provide testimony regarding the design of the subject buckle. He is also

expected to testify as to his investigation, fact-findings, and professional opinions in regard to his forensic analysis of how the subject buckle failed to remain latched in the accident. A copy of *Dr. Good's curriculum vitae and written report* is attached.

3. Jeremy R. Cummings, Ph.D.  
Cummings Scientific, LLC  
3019 Shannon Lake North  
Heritage Oaks Business Center, Suite 204  
Tallahassee, FL 32309  
Telephone: (850) 228-3335

Dr. Cummings is a biomechanical engineer expert. He is expected to provide testimony regarding the occupant kinematics of the subject incident. Additionally, he is expected to provide testimony as to his investigation, fact-findings, and professional opinions in regard to the subject incident, and the Plaintiff's restraint use prior to the accident. A copy of *Dr. Cumming's curriculum vitae and written report* are attached.

4. Oliver G. Wood, Jr., Ph.D.  
Post Office Box 24677  
Columbia, SC 29224  
Telephone: (803) 736-1300

Dr. Wood is a consulting economist. He is expected to give testimony and professional opinions in conformance with the knowledge of Plaintiff's economic loss. A copy of Dr. Wood's *curriculum vitae and written report* are attached.

**AMENDED DISCLOSURE:**

Dr. Wood is expected to testify about the defendants' ability to pay punitive damages as based upon financial reports prepared by Dr. Wood on May 17, 2011, which are attached and identified below:

- a. Preliminary Evaluation of Financial Information and Data on Autoliv, Inc.,
- b. Preliminary Evaluation of the Financial Information and Data on Nissan Motor Co.,Ltd.

**SECOND AMENDED DISCLOSURE:**

Craig Good, Ph.D., P.Eng.  
Collision Analysis Ltd.  
43 Skyline Crescent NE  
Calgary, Alberta T2K 5X2  
Telephone: (403) 250-7533

Dr. Good is a buckle design and manufacturing engineer. He is expected to provide testimony regarding the design of the subject buckle. He is also expected to testify as to his investigation, fact-findings, and professional opinions in regard to his forensic analysis of how the subject buckle failed to remain latched in the accident. A copy ***Dr. Craig Good's Rebuttal Report dated January 29, 2013*** is hereto attached.

**[Signature Page to Follow]**

Respectfully submitted,

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~and~

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

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**ATTORNEYS FOR PLAINTIFF**

January 29, 2013.  
Hampton, South Carolina.